

July 6, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
RE: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

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Dear Sir or Madam:

I am writing to express my concern about the proposed Business Opportunity Rule R511993. In its present form, I feel it could dramatically hinder my business with Arbonne International as an Independent Consultant. I understand and respect that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices", and am glad that I too have been protected as such, but some areas of the proposed rule will make it very difficult if not impossible for me to represent Arbonne products and sponsor people into the business that I love. As a very busy person, I would feel very hindered to have to keep track of every move I make with each person. I currently keep very good records, but I believe that more records especially to a new person would cause many of them (me included) to decide its just too much extra paperwork.

One of the most confusing and restrictive sections of the proposed rules is the 7-day waiting period to sign up new Consultants. It currently takes several look and see, check us out, do your due diligence and then decide for yourself if this is a fit for you appointments with prospective sponsors, so I am very confused why we would need to then want to make someone wait for 7 days when they have made a business decision for themselves. If someone did that to me, I would wonder if they were serious about helping me. Not to mention, the fact that when people are searching for a product and we allow them to sample and to try before they buy (which is unheard of at the cosmetic counters) And then with a purchase a 45 day money back guarantee, why would I then want to stop an excited customer from the opportunity to purchase a product that can potentially make her/him feel better about their appearance. Our Arbonne Starter Kits cost a nominal amount of money, and I believe the proposed waiting period would cause doubt in the prospective sponsors mind. With this waiting period, my record keeping will increase, and my part time business will require more time. I really believe this waiting period will cause many people to decide this is not for them, and ultimately limit my ability to grow my business.

The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not and will not

matter if the company was found guilty or innocent, and in a court of law, that is what ultimately makes the difference. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne HAS been found guilty of something. If I were someone looking at a business, I would most likely look into something else if I believed I could potentially be getting into something unethical, and the implication here would be the same for anyone else.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am very concerned with providing references to people that I would be potentially deciding if THEY would be a good fit for my business, and quite concerned with protecting the identity of my current team members. The increase in identity theft is a reality we live with in today's world and I am very uncomfortable with giving out personal information about individuals, without their permission or knowledge to strangers. Not to mention that we already conduct Meet the Team events where people can meet other Independent Consultants. And, in a world where one must be protective of nearly everything, I feel it would put everyone involved at jeopardy to competitors. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne Corporate Office in California and then wait for the list. This would also put a strain on my Corporate Office and that which they need to do best, which is supporting us would be diluted with unnecessary busy work. It would be so time consuming for everyone. The proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers". To my knowledge, it is not within our jurisdiction to describe Arbonne as a business opportunity. But, I can guarantee you that if I thought my personal information could be disclosed to other buyers – I would not be giving it to anyone. I would find it an invasion of privacy to disclose personal data, for my business purposes and an invasion to others to expect them to do so as well.

I have been an Arbonne Independent Consultant for more than 16 years. I became a Consultant initially because I loved the products with no intention of building a business. I since realized my potential to add income to our household and take some of the burden off of my husbands already stressed shoulders. I have developed a wonderful team of other men and women who love the products and enjoy sharing them with other people, and giving them the opportunity to decide for themselves if this is a fit for them or not. Many many many of us are enjoying much better lives because of the many aspects involved with a home based direct sales business.

In conclusion, I truly appreciate knowing there is someone watching over and scrutinizing unscrutable businesses, but I believe this proposed new rule would have major detrimental (and unintentional) consequences and I trust there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers and their families whom are working an honest business.

Thank you for your time and understanding.

Sincerely,

Debra S. Knurek
Independent Consultant
National Vice President
Arbonne International